

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION**

**MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)**

THIS DOCUMENT RELATES TO:

All Cases

**THE STOPNC DEFENDANTS’
MOTION FOR EXTENSION OF DEADLINE TO FILE A RESPONSE TO
THE PSC’S BRIEF AND ASSOCIATED MOTION *IN LIMINE*
REGARDING MICHAEL O’NEAL [Doc. 2608, 2609]**

Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; and Vaughan Allen, MD (“STOPNC Defendants”) file this Motion for Extension of Deadline to file a response to the PSC’s brief at Doc. 2608 and 2609 regarding the applicability of the quality improvement privilege to Michael O’Neal (“Dr. O’Neal”). As grounds for the motion, the STOPNC Defendants state:

1. At Doc. 2534, the Court allowed the PSC to take the deposition of Michael O’Neal, STOPNC’s pharmacy consultant, on limited topics, to evaluate the applicability of Tennessee’s quality improvement privilege.¹ Pursuant to that Order, the PSC was allowed, after the deposition, to file a brief challenging the application of the privilege, and the STOPNC Defendants were given 14 days to respond.

¹ TENN. CODE ANN. § 68-11-272.